

EXHIBIT B

From: Seth Carson <seth@dereksmithlaw.com>
Sent: Tuesday, January 26, 2021 10:32 AM
To: Benson, Leigh Ann
Cc: Cavalier, Jonathan; Sidney Gold; Bill Rieser
Subject: Re: McNulty v. MEF--discovery

****EXTERNAL SENDER****

This is the way that people produce text threads in a case like this. They do not engage experts and spend tens of thousands of dollars so you can see pictures or emojis that have absolutely nothing to do with the case. She went on her phone with an application that was purchased and downloaded her text threads. What else could you possibly need?

Are there certain texts that you think are relevant to Greg Roman's sexual assault or MEF's defenses that you cannot see? If there are, I suggest we get on the phone and come up with a solution.

That is the only remedy I can think of.

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From: Benson, Leigh Ann <LBenson@cozen.com>
Sent: Tuesday, January 26, 2021 10:27 AM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Cavalier, Jonathan <JCavalier@cozen.com>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser

<brieser@discrimlaw.net>

Subject: McNulty v. MEF--discovery

Seth,

We have preliminarily reviewed McNulty's production, which we received on January 12th. We were frankly surprised at the format of the production given that it is rife with the same issues that we have been confronting for months in the Barbounis matter. These issues include, but are not limited to, the fact that the text threads are produced as PDF files, the images are embedded and thus distorted, and we do not have load files.

Please advise when you will remedy these issues to conform the production with the proper formatting. We really need this addressed quickly given that the discovery deadline is next Monday.

Leigh Ann



Leigh Ann Benson

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